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**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Application by SBC Communications Inc,)	
Southwestern Bell Telephone Company, and)	CC Docket No. 00-4
Southwestern Bell Communications Services,)	
Inc. d/b/a Southwestern Bell Long Distance for)	
Provision of In-Region InterLATA Services in)	
Texas)	
)	

AFFIDAVIT OF CHRISTINE A. MAILLOUX

1. My name is Christine A. Mailloux. I am Assistant General Counsel for NorthPoint Communications, Inc. My business address is 303 Second Street, San Francisco, CA 94107.

2. Attached to this affidavit are copies of spreadsheets from SBC's Performance Measurements web site. Attachment 1 contains NorthPoint-specific data for Performance Measurement 55.1 (Average Installation Interval-DSL) and Performance Measurement 57 (Average Response Time for Loop Makeup Information). This data includes each of the four geographic markets in Texas for the dates August 1999-December 1999.

3. Attachment 2 contains aggregate CLEC data, found in the Regulatory Agency (DOJ) Reports and the FCC Reports. Attachment 2 also contains only data for Performance Measurement 55.1 and 57 for August 1999 to December 1999.

4. The spreadsheets in Attachment 1 show that, for Performance Measurement 55.1, Southwestern Bell had recorded a total of zero DSL capable loop orders for the entire state of Texas throughout 1999. However, for Performance Measurement 57 the total is 742 requests by NorthPoint for loop qualification throughout Texas over the last five months in 1999.

5. The spreadsheets in Attachment 2 show, for the Agency Reports, 164 total DSL capable loop orders for Texas in 1999 under Performance Measurement 55.1. The FCC reports also show 164 loop orders for Texas in 1999 for the same measurement. The Regulatory Agency Reports, Performance Measurement 57, shows 2019 requests for loop makeup for all CLECs, in all the Texas markets for the last five months in 1999.

6. On January 28, 2000, I spoke to William R. Dysart to clarify why the performance measurement data posted on the web site, and relied upon by Mr. Dysart in his Affidavit, showed zero DSL capable loop orders for NorthPoint in measurement 55.1. We also discussed why the same performance data, and his Attachments G and R to his affidavit, show DSL measurements in the Resale and Specials categories. Mr. Dysart indicated that there had been a mistake in tabulating the NorthPoint loop orders for Performance Measurement 55.1 and for the other performance measurements in the Resale and Specials categories. Mr. Dysart agreed

that SWBT will have to correct the data and that such a correction will affect the support for his Affidavit in Attachments G and R.

7. I declare under penalty of perjury of the laws of the State of California and the United States of America that the foregoing is true and correct.

DATED: January 31, 2000

A handwritten signature in cursive script, reading "Christine Mailloux", written over a horizontal line.

Christine Mailloux

ATTACHMENT 1

Average Installation Interval - DSL						
No. 55.1	Loops Requiring No Conditioning					
	CLEC		SWBT	Avg. Interval (Days) Difference	Z - Value	Avg. All CLECs Avg. Interval (Days)
	No. of Orders	Avg. Interval (Days)	Avg. Interval (Days)			
Aug-99	0	n/a	n/a	n/a	Base < 30	n/a
Sep-99	0	n/a	7.64	n/a	Base < 30	n/a
Oct-99	0	n/a	6.02	n/a	Base < 30	n/a
Nov-99	0	n/a	6.12	n/a	Base < 30	n/a
Dec-99	0	n/a	6.06	n/a	Base < 30	n/a
12 Mo. Total	0	n/a	6.42	n/a		n/a
	Loops Requiring Conditioning					
	CLEC		SWBT	Avg. Interval (Days) Difference	Z - Value	Avg. All CLECs Avg. Interval (Days)
	No. of Orders	Avg. Interval (Days)	Avg. Interval (Days)			
Aug-99	0	n/a	n/a	n/a	Base < 30	n/a
Sep-99	0	n/a	n/a	n/a	Base < 30	n/a
Oct-99	0	n/a	n/a	n/a	Base < 30	n/a
Nov-99	0	n/a	n/a	n/a	Base < 30	n/a
Dec-99	0	n/a	n/a	n/a	Base < 30	15.00
12 Mo. Total	0	n/a	n/a	n/a		15.00

Average Response Time for Loop Make-Up Information						
No. 57	CLEC		SWBT	Avg. Resp. Time Difference	Z - Value	Avg. All CLECs Avg. Resp. Time
	No. Loop Qualifications	Avg. Resp. Time	Avg. Resp. Time			
Aug-99	0	n/a	0.99	n/a	Base < 30	n/a
Sep-99	0	n/a	1.16	n/a	Base < 30	n/a
Oct-99	0	n/a	1.39	n/a	Base < 30	n/a
Nov-99	0	n/a	0.88	n/a	Base < 30	0.33
Dec-99	0	n/a	0.50	n/a	Base < 30	0.20
12 Mo. Total	0	n/a	0.93	n/a		0.25

Average Installation Interval - DSL						
No. 55.1	Loops Requiring No Conditioning					
	CLEC		SWBT	Avg. Interval (Days) Difference	Z - Value	Avg. All CLECs Avg. Interval (Days)
	No. of Orders	Avg. Interval (Days)	Avg. Interval (Days)			
Aug-99	0	n/a	n/a	n/a	Base < 30	n/a
Sep-99	0	n/a	5.79	n/a	Base < 30	9.50
Oct-99	0	n/a	5.05	n/a	Base < 30	5.43
Nov-99	0	n/a	5.27	n/a	Base < 30	7.20
Dec-99	0	n/a	5.60	n/a	Base < 30	6.50
12 Mo. Total	0	n/a	5.46	n/a		6.85
	Loops Requiring Conditioning					
	CLEC		SWBT	Avg. Interval (Days) Difference	Z - Value	Avg. All CLECs Avg. Interval (Days)
	No. of Orders	Avg. Interval (Days)	Avg. Interval (Days)			
Aug-99	0	n/a	n/a	n/a	Base < 30	n/a
Sep-99	0	n/a	12.33	n/a	Base < 30	13.00
Oct-99	0	n/a	13.00	n/a	Base < 30	9.67
Nov-99	0	n/a	n/a	n/a	Base < 30	43.00
Dec-99	0	n/a	n/a	n/a	Base < 30	16.60
12 Mo. Total	0	n/a	12.50	n/a		19.18

Average Response Time for Loop Make-Up Information						
No. 57	CLEC		SWBT	Avg. Resp. Time Difference	Z - Value	Avg. All CLECs Avg. Resp. Time
	No. Loop Qualifications	Avg. Resp. Time	Avg. Resp. Time			
Aug-99	0	n/a	3.01	n/a	Base < 30	4.50
Sep-99	0	n/a	3.19	n/a	Base < 30	3.25
Oct-99	18	3.06	3.22	-0.16	Base < 30	3.52
Nov-99	41	2.37	2.30	0.07	0.41	2.33
Dec-99	34	1.76	1.89	-0.13	(0.39)	1.63
12 Mo Total	93	2.28	2.66	-0.38		2.63

Average Installation Interval - DSL						
No. 55.1	Loops Requiring No Conditioning					
	CLEC		SWBT	Avg. Interval (Days)		Avg. All CLECs Avg. Interval (Days)
	No. of Orders	Avg. Interval (Days)	Avg. Interval (Days)	Difference	Z - Value	
Aug-99	0	n/a	n/a	n/a	Base < 30	n/a
Sep-99	0	n/a	5.75	n/a	Base < 30	n/a
Oct-99	0	n/a	4.94	n/a	Base < 30	9.83
Nov-99	0	n/a	5.67	n/a	Base < 30	6.60
Dec-99	0	n/a	6.24	n/a	Base < 30	6.50
12 Mo. Total	0	n/a	5.69	n/a		7.46
	Loops Requiring Conditioning					
	CLEC		SWBT	Avg. Interval (Days)		Avg. All CLECs Avg. Interval (Days)
	No. of Orders	Avg. Interval (Days)	Avg. Interval (Days)	Difference	Z - Value	
Aug-99	0	n/a	n/a	n/a	Base < 30	n/a
Sep-99	0	n/a	11.00	n/a	Base < 30	9.11
Oct-99	0	n/a	8.33	n/a	Base < 30	17.87
Nov-99	0	n/a	11.50	n/a	Base < 30	23.00
Dec-99	0	n/a	11.50	n/a	Base < 30	15.33
12 Mo. Total	0	n/a	10.25	n/a		15.74

Average Response Time for Loop Make-Up Information						
No. 57	CLEC		SWBT	Avg. Resp. Time Difference	Z - Value	Avg. All CLECs Avg. Resp. Time
	No. Loop Qualifications	Avg. Resp. Time	Avg. Resp. Time			
Aug-99	0	n/a	2.32	n/a	Base < 30	n/a
Sep-99	0	n/a	3.08	n/a	Base < 30	3.10
Oct-99	65	3.06	2.95	0.11	0.34	3.18
Nov-99	194	2.22	2.12	0.10	0.65	2.05
Dec-99	160	2.07	1.97	0.10	0.74	2.07
12 Mo. Total	419	2.29	2.46	-0.16		2.26

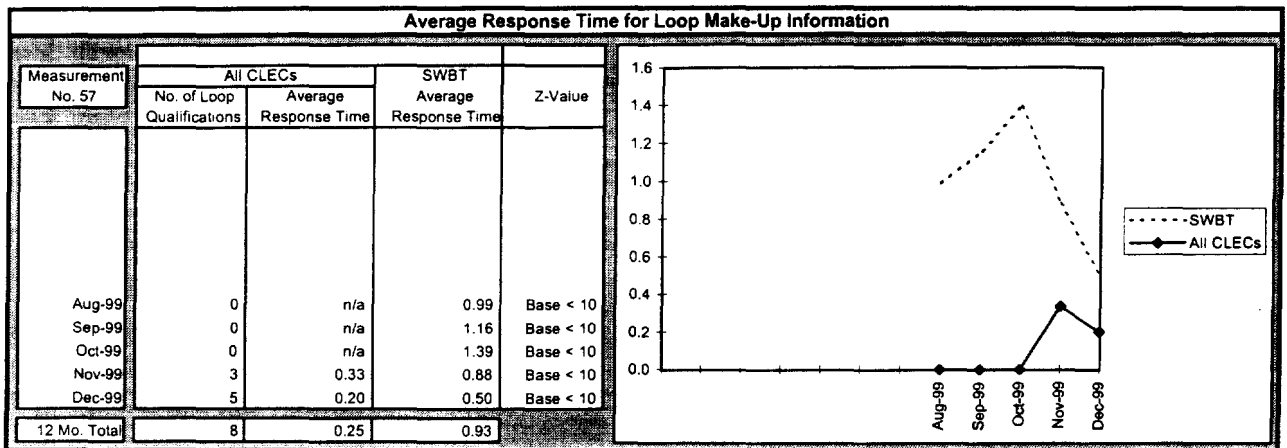
Average Installation Interval - DSL						
No. 55.1	Loops Requiring No Conditioning					
	CLEC		SWBT	Avg. Interval (Days) Difference	Z - Value	Avg. All CLECs Avg. Interval (Days)
	No. of Orders	Avg. Interval (Days)	Avg. Interval (Days)			
Aug-99	0	n/a	n/a	n/a	Base < 30	n/a
Sep-99	0	n/a	10.93	n/a	Base < 30	n/a
Oct-99	1	7.00	7.47	-0.47	Base < 30	7.00
Nov-99	0	n/a	8.15	n/a	Base < 30	11.00
Dec-99	0	n/a	8.42	n/a	Base < 30	8.75
12 Mo. Total	1	7.00	8.82	-1.82		9.88
	Loops Requiring Conditioning					
	CLEC		SWBT	Avg. Interval (Days) Difference	Z - Value	Avg. All CLECs Avg. Interval (Days)
	No. of Orders	Avg. Interval (Days)	Avg. Interval (Days)			
Aug-99	0	n/a	n/a	n/a	Base < 30	n/a
Sep-99	0	n/a	n/a	n/a	Base < 30	n/a
Oct-99	0	n/a	n/a	n/a	Base < 30	15.00
Nov-99	0	n/a	n/a	n/a	Base < 30	31.00
Dec-99	0	n/a	n/a	n/a	Base < 30	12.80
12 Mo. Total	0	n/a	n/a	n/a		15.71

Average Response Time for Loop Make-Up Information						
No. 57	CLEC		SWBT	Avg. Resp. Time Difference	Z - Value	Avg. All CLECs Avg. Resp. Time
	No. Loop Qualifications	Avg. Resp. Time	Avg. Resp. Time			
Aug-99	0	n/a	3.30	n/a	Base < 30	n/a
Sep-99	0	n/a	3.98	n/a	Base < 30	2.59
Oct-99	42	1.05	4.21	-3.16	(19.90)	0.99
Nov-99	95	0.31	3.18	-2.88	(25.61)	0.36
Dec-99	93	0.41	3.67	-3.27	(27.07)	0.42
12 Mo. Total	230	0.48	3.69	-3.21		0.55

ATTACHMENT 2

PERFORMANCE MEASUREMENT TRACKING
Provisioning - Unbundled Network Elements (UNE)

December 1999
South Texas

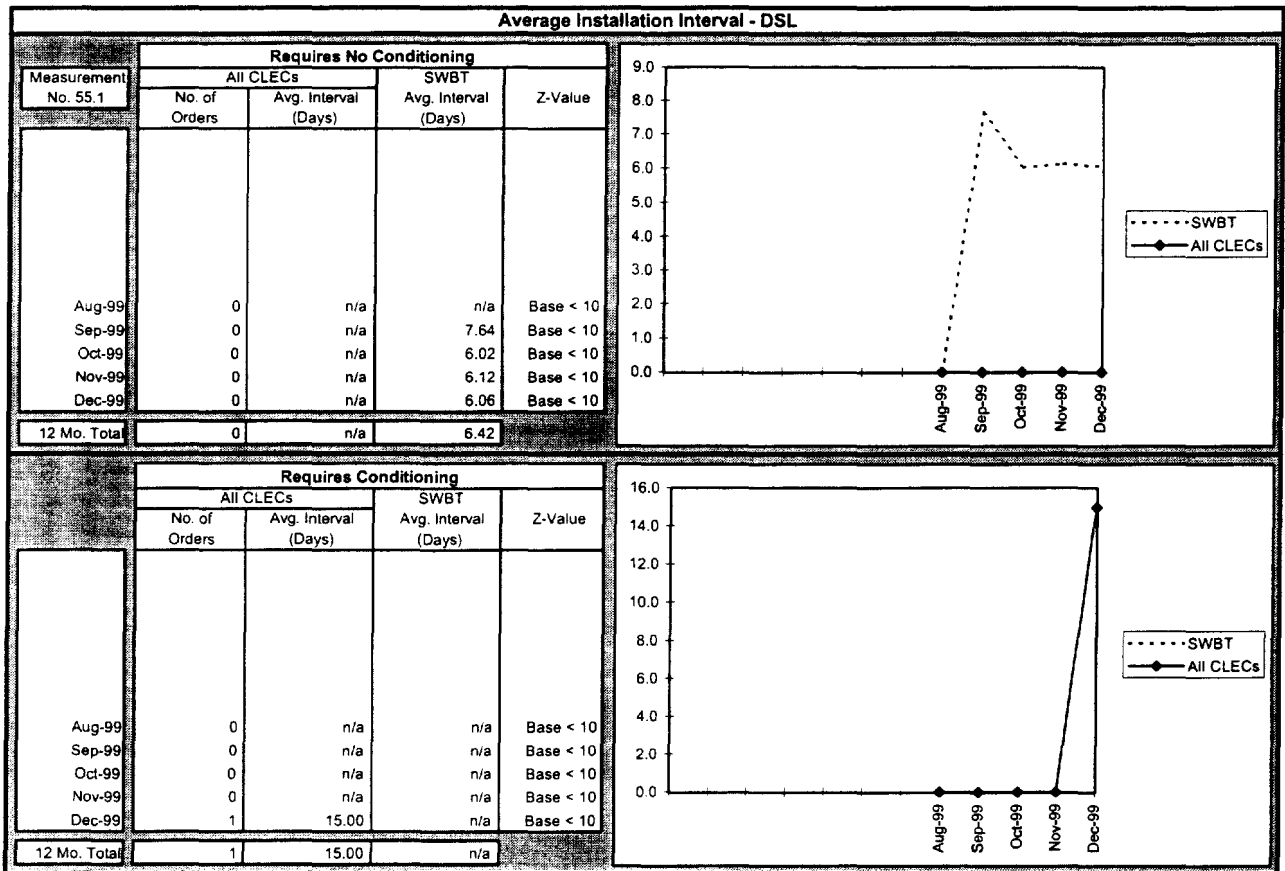


PERFORMANCE MEASUREMENT TRACKING

December 1999

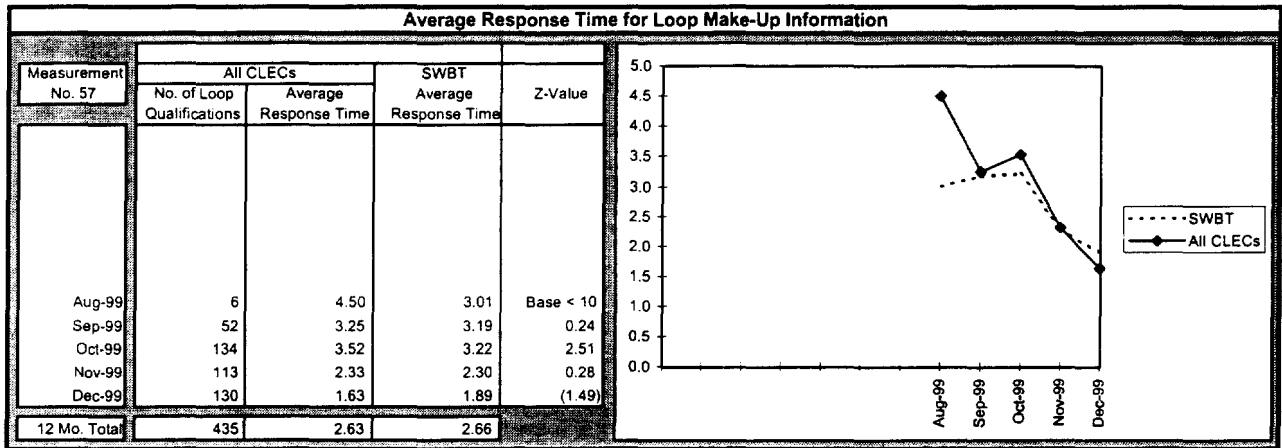
Provisioning - Unbundled Network Elements (UNE)

South Texas



PERFORMANCE MEASUREMENT TRACKING
 Provisioning - Unbundled Network Elements (UNE)

December 1999
 Central / West Texas

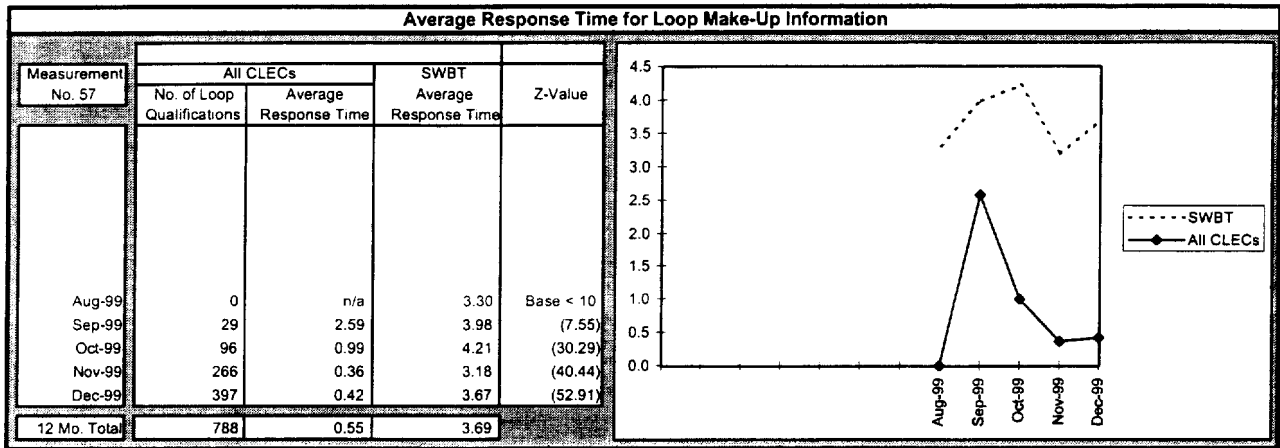


PERFORMANCE MEASUREMENT TRACKING

December 1999

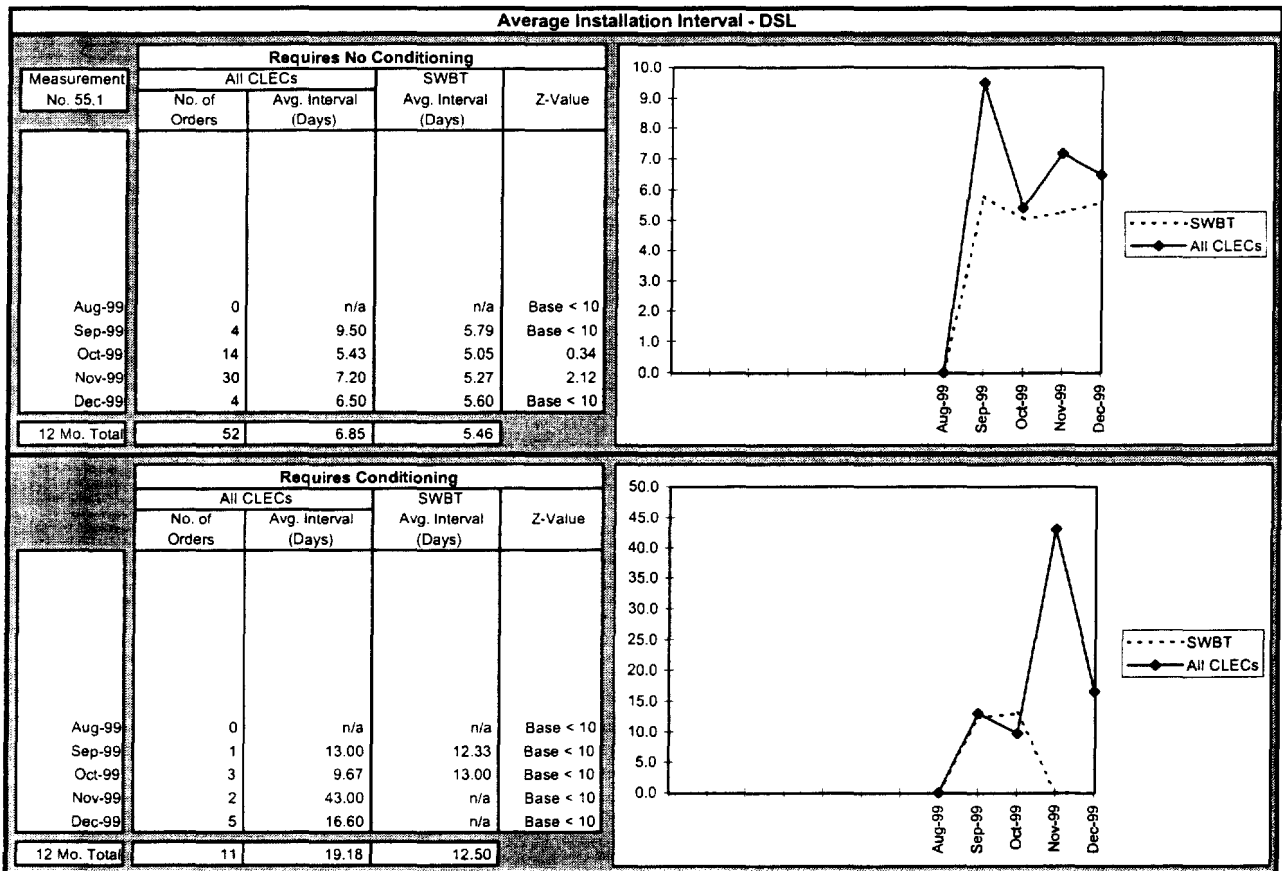
Provisioning - Unbundled Network Elements (UNE)

Houston



PERFORMANCE MEASUREMENT TRACKING
Provisioning - Unbundled Network Elements (UNE)

December 1999
Central / West Texas

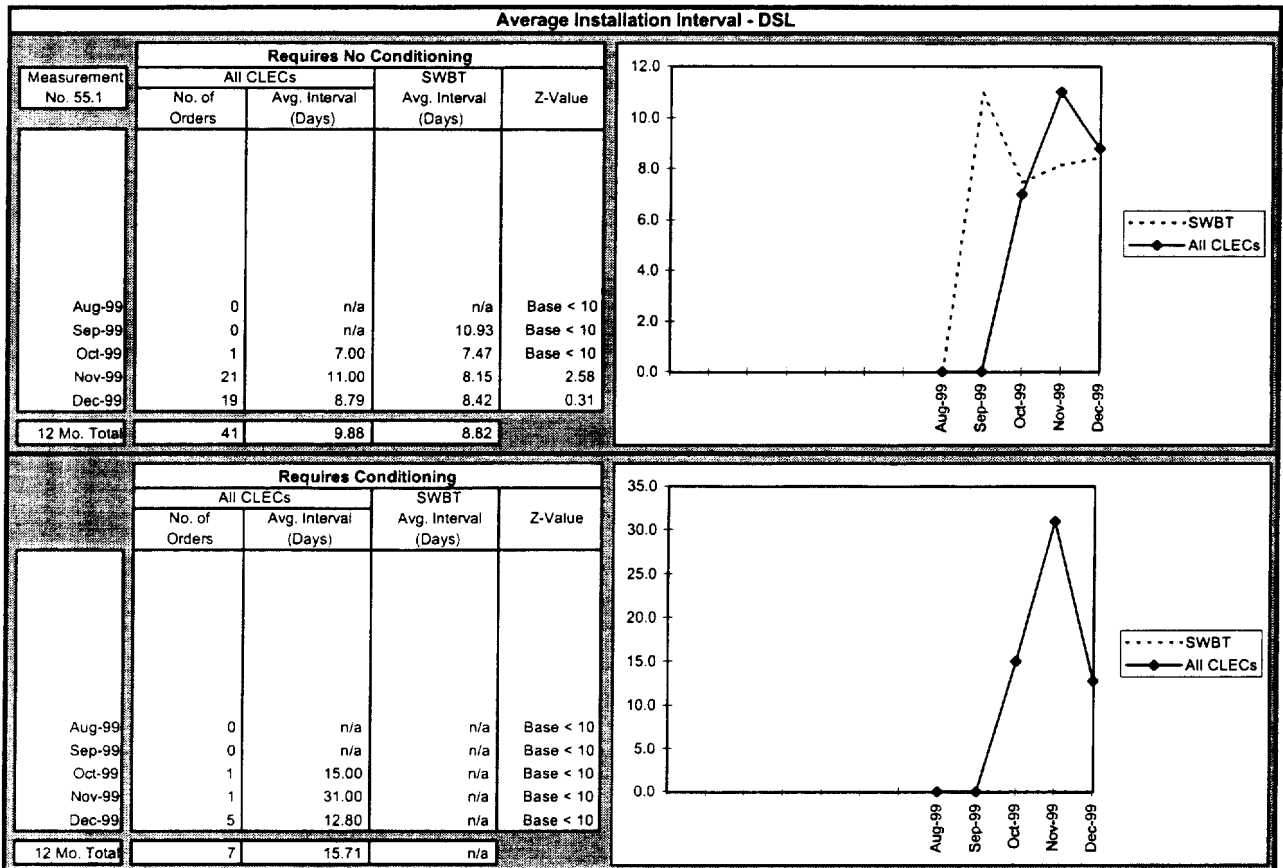


PERFORMANCE MEASUREMENT TRACKING

December 1999

Provisioning - Unbundled Network Elements (UNE)

Houston

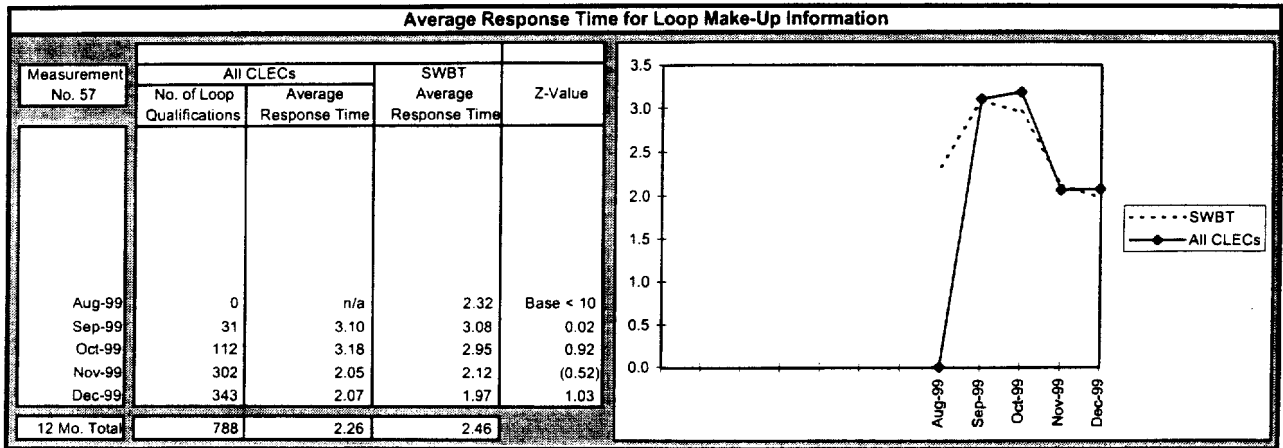


PERFORMANCE MEASUREMENT TRACKING

Provisioning - Unbundled Network Elements (UNE)

December 1999

Dallas / Ft. Worth



PERFORMANCE MEASUREMENT TRACKING

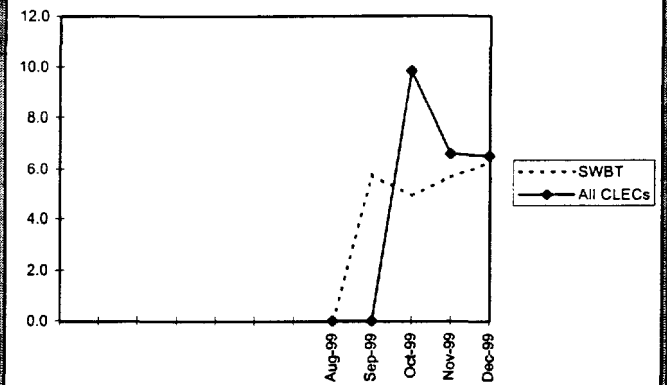
Provisioning - Unbundled Network Elements (UNE)

December 1999

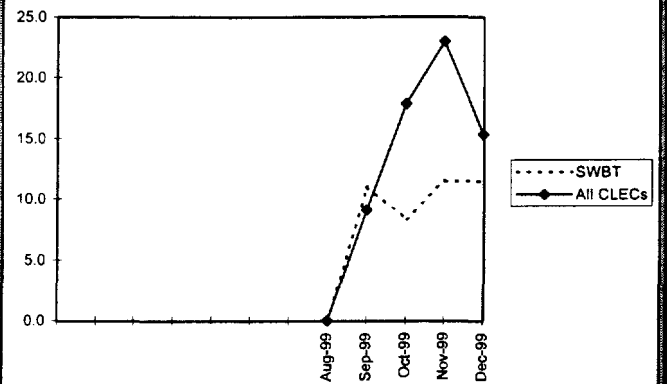
Dallas / Ft. Worth

Average Installation Interval - DSL

Measurement No. 55.1	Requires No Conditioning			
	All CLECs		SWBT	Z-Value
	No. of Orders	Avg. Interval (Days)	Avg. Interval (Days)	
Aug-99	0	n/a	n/a	Base < 10
Sep-99	0	n/a	5.75	Base < 10
Oct-99	6	9.83	4.94	Base < 10
Nov-99	5	6.60	5.67	Base < 10
Dec-99	10	6.50	6.24	0.14
12 Mo. Total	21	7.48	5.69	




Measurement No. 55.1	Requires Conditioning			
	All CLECs		SWBT	Z-Value
	No. of Orders	Avg. Interval (Days)	Avg. Interval (Days)	
Aug-99	0	n/a	n/a	Base < 10
Sep-99	9	9.11	11.00	Base < 10
Oct-99	15	17.87	8.33	5.74
Nov-99	4	23.00	11.50	Base < 10
Dec-99	3	15.33	11.50	Base < 10
12 Mo. Total	31	15.74	10.25	



CERTIFICATE OF SERVICE

I, Valerie Yates, do hereby certify that on this day of January 31, 2000, I caused a copy of the foregoing Comments of NorthPoint Communications, Inc. to be served upon each of the parties listed on the attached Service List.


Valerie Yates

* By messenger

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